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*Attorneys for Cerberus Capital Management, L.P.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	:	Case No. 12-12020 (MG)
	:	
Debtors.	:	Jointly Administered
	:	
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**NOTICE OF STIPULATION ADOPTING UNIFORM PROTECTIVE ORDER FOR  
EXAMINER DISCOVERY FOR PURPOSES OF DISCOVERY OF  
CERBERUS CAPITAL MANAGEMENT, L.P. BY THE TRIAXX ENTITIES**

PLEASE TAKE NOTICE that non-Debtors Cerberus Capital Management, L.P.  
("Cerberus") and Triaxx Prime CDO 2006-1, LLC, Triaxx Prime CDO 2006-2, LLC and Triaxx  
Prime CDO 2007-1, LLC (collectively, "Triaxx") hereby file the *Stipulation Adopting Uniform  
Protective Order for Examiner Discovery for Purposes of Discovery of Cerberus Capital  
Management, L.P. by the Triaxx Entities*, attached hereto as Exhibit A, in connection with the  
*Order (I) Granting Examiner Authority to Issue Subpoenas for the Production of Documents and  
Authorizing the Examination of Persons and Entities, (II) Establishing Procedures for  
Responding to Those Subpoenas, (III) Approving Establishment of a Document Depository and  
Procedures to Govern Use, and (IV) Approving Protective Order*, dated August 20, 2012 [ECF  
No. 1223].

Respectfully Submitted,

Dated: October 17, 2012  
New York, New York

SCHULTE ROTH & ZABEL LLP

By: /s/: Howard O. Godnick  
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